REMARKS

This Response is submitted in reply to the Office Action dated December 13, 2004, and in accordance with the personal interview courteously granted by the Examiner on April 19, 2005. Claims 1, 9 to 14, 16, 22 to 26, 28 to 30, 34 to 37, 39, 46, 47 to 51, 53, 59, 60, 62 to 67, and 71 to 74 have been amended. Claims 76 to 87 have been added. The Specification has been amended. A new sheet of Drawings has been submitted. No new subject matter has been added by the amendments, the new claims or the new sheet of Drawings. A Petition for a Two-Month Extension of Time and a Supplemental Information Disclosure Statement are submitted herewith. A check in the amount of $1050 is submitted herewith to cover the cost of the two-month extension and the new claims, and a check in the amount of $180 has been submitted herewith to cover the cost of the Supplemental Information Disclosure Statement. Please charge Deposit Account No. 02-1818 for any additional fees that are deemed necessary.

The Office Action objected to the Drawings under 37 C.F.R. §1.83(a). Claims 7, 20, 32, 45, 57 and 69 recite that the second components can include values, and the first components can include multipliers. Although illustration of this alternative arrangement is not essential for a proper understanding of the present invention, Applicant has submitted herewith a sheet of Drawings which include new Figs. 3A and 4A in compliance with 37 C.F.R. §1.121(d) and has amended the Specification accordingly. New Figs. 3A and 4A illustrate the alternative arrangement recited in Claims 7, 20, 32, 45, 57 and 69 and supported in the original Specification at, for example, page 20, lines 28-31. Accordingly, Applicant respectfully submits no new subject matter is added by the Drawings and that the objection to the Drawings has been overcome.

The Office Action objected to the Abstract of the Specification. Applicant has amended the Abstract in accordance with the recommendation set forth in the Office Action and respectfully submits that the objection has been overcome.

The Office Action objected to Claims 11, 24 and 39 due to informalities. Applicant has amended Claims 11, 24 and 39 and respectfully submits that the

objection has been overcome. In addition, Claims 46 and 49 have been amended for informalities.

The Office Action rejected Claims 14, 26, 37, 51, 63 and 74 under 35 U.S.C. §112, second paragraph. Applicant has amended Claims 14, 26, 37, 51, 63 and 74 in accordance with the recommendations set forth in the Office Action and respectfully submits that the rejection has been overcome.

The Office Action rejected Claims 1 to 6, 8 to 12, 14, 16 to 19, 21 to 26, 27 to 31, 33 to 37, 39 to 44, 46 to 51, 53 to 56, 56 to 63, 65 to 68 and 70 to 74 under 35 U.S.C. §102(e) as being anticipated by *Locke* et al. ("*Locke*"). Applicant respectfully disagrees with and traverses this rejection for the reasons discussed below.

In *Locke*, the appearance of a special combination of symbols, such as three CLOCK symbols in Fig. 3 of *Locke*, on one or more of the reels causes a CPU to shift operation from the basic game to a multiple free-spin feature. In the multiple free-spin feature, the player is awarded five free spins of the reels. At the beginning of the free-spin feature, the upper part of the display above the reels initially depicts a plurality of selectable hourglasses and a plurality of associated payout multipliers beneath the respective hourglasses as illustrated in Fig. 4 of *Locke*. The multipliers range from 1X to 5X and are arranged in the following symmetrical sequence: 1X, 1X, 2X, 2X, 3X, 5X, 3X, 2X, 2X, 1X, and 1X. The lowest multipliers of 1X are on the outside and gradually increase to the largest multiplier of 5X in the middle.

Prior to each free spin, the CPU in *Locke* randomly selects one of the hourglasses and its associated multiplier from the plurality of hourglasses. *Locke*, column 4, lines 50-51. For each free spin of the reels, the CPU randomly selects a game outcome and then rotates and stops the reels to depict symbols representing the selected game outcome. *Locke*, column 4, lines 39-42. If the selected game outcome corresponds to a winning outcome (e.g., symbol combinations resulting in payment of coins or credits), the gaming machine determines a payout according to the pay table for the basic slot game. This payout is multiplied by the multiplier associated with the hourglass selected prior to the free spin to determine the player's award.

For example, as illustrated in Fig. 4 of *Locke*, prior to the first free spin, the CPU randomly selects the hourglass associated with the multiplier of 5X. As shown in Fig. 5 of *Locke*, the first free spin results in a winning symbol combination of three SUN symbols along a pay line. According to the pay table, this winning symbol combination is normally associated with a payout of 19 credits. This payout is multiplied by the selected payout multiplier of 5X to produce a total payout for the first free spin of 95 credits.

Additionally, after each free spin, the CPU removes the outermost pair of hourglasses and their associated multipliers from the plurality of selectable hourglasses. Therefore, after the first free spin and prior to the second free spin, the first 1X multiplier on each end is removed from selection, and the CPU randomly selects from the hourglasses associated with the following sequence of multipliers: 1X, 2X, 2X, 3X, 5X, 3X, 2X, 2X and 1X. After the second free spin, the remaining or second 1X multiplier on each end is removed from selection, and the CPU randomly selects from the hourglasses associated with the following sequence of multipliers: 2X, 2X, 3X, 5X, 3X, 2X and 2X. After the third free spin, the first 2X multiplier on each end is removed from selection, and the CPU randomly selects from the hourglasses associated with the following sequence of multipliers: 2X, 3X, 5X, 3X and 2X, and so forth for a total of five free spins. Accordingly, *Locke* teaches changing the set of possible multipliers for each free spin of the reels.

Each of Claims 1, 16 and 28 provide a gaming device which includes, among other elements, a plurality of first components and a plurality of sets of second components. As discussed in the interview, to further clarify the present invention, these claims have been amended such that each set of second components has a fixed relationship with one of the first components, each of the first components has a fixed relationship with one of the sets of second components, and each set of second components includes the same number of second components.

Each of Claims 39, 53 and 65 have been amended to provide each set of second components having a fixed relationship with one of the first components, each of the

first components having a fixed relationship with one of the sets of second components, and each set of second components including the same number of second components.

Locke does not disclose each of a plurality of sets of second components having the same number of second components as in each of the independent claims. The Office Action interprets the plurality of sets of second components as the sets of multipliers in *Locke*. Office Action pages 5-6. As described above, after each free spin, the CPU removes the outermost pair of hourglasses and their associated multipliers from the plurality of selectable hourglasses leaving a different number of hourglasses associated with each free spin. Even if the sets of multipliers of *Locke* can be interpreted as the second components in the claimed invention as suggested by the Office Action, *Locke* does not disclose each of a plurality of sets of second components having the same number of second components.

Furthermore, *Locke* does not disclose each of a plurality of sets of second components having a fixed relationship with one of a plurality of first components as in each of the independent claims. The Office Action interprets combinations of symbols on the reels and/or the free spins themselves in *Locke* to be a plurality of first components. The Office Action contends that the multipliers in *Locke* are grouped into different sets for each free spin because the CPU eliminates the outermost multipliers from the set of multipliers for each free spin leaving a different number of multipliers in each set, as discussed above. According to the Office Action, these different multiplier sets are associated with one of the combinations of symbols on the reels during free spins.

Assuming, *arguendo*, that the first and second components of the present invention can be interpreted as suggested by the Office Action, there is no fixed relationship between the combinations of symbols (first components) generated during a particular free spin in *Locke* and the multiplier sets (second components) associated with that free spin. As discussed above, in *Locke*, the set of multipliers for a particular free spin are independent of any combination of symbols generated on the reels during that free spin. The combination of symbols generated on the reels in no way determines from which set of multipliers the CPU picks a multiplier or which multiplier is

picked by the CPU. Nor does the set of multipliers from which the CPU picks or the particular multiplier picked by the CPU determine the combination of symbols generated on the reels. For example, the CPU in *Locke* selects from the multipliers 1X, 1X, 2X, 2X, 3X, 5X, 3X, 2X, 2X, 1X and 1X in the first free spin illustrated in Fig. 4, as described above. The selected multiplier is applied to the award associated with the winning symbol combination of three SUN symbols. Even if the <u>same</u> winning symbol combination of three SUN symbols occurs again in a subsequent free spin, the CPU in *Locke* will select from a <u>different</u> set of multipliers. Therefore, there is no fixed relationship between the combination of symbols (the first components) and the sets of multipliers (the sets of second components).

The Office Action also attempts to interpret first components to be free spins at, for example, page 8 of the Office Action to support its contention that *Locke* discloses a display device adapted to display the associations of the sets of second components with the first components. Even if the first components can be interpreted to be free spins, *Locke* does not disclose an award based on one of the first components (free spins) as in the claimed invention. Furthermore, to rely on interpreting the first components as two completely different elements in *Locke*, i.e., symbol combinations and free spins, to support the rejections is clearly improper.

Accordingly, Applicant respectfully submits that *Locke* fails to anticipate independent Claims 1, 16, 28, 39, 53 and 65 and the claims which depend therefrom. Claims 1, 6, 9, 10, 12, 16, 22, 23, 25, 28 to 30, 35, 36, 39, 47, 48, 50, 51, 53, 59, 60, 62, 65 to 67, 72 and 73 are, therefore, in condition for allowance.

Claims 7, 20, 32, 45, 57 and 69 are rejected under 35 U.S.C. §103(a) as being unpatentable over *Locke*. Applicant respectfully submits that independent Claims 1, 16, 28, 39, 53 and 65 are in condition for allowance for the reasons discussed above. Accordingly, Claims 7, 20, 32, 45, 57 and 69 which depend therefrom, respectively, are also in condition for allowance.

Claims 13, 15, 27, 38, 52, 64 and 75 are rejected under 35 U.S.C. §103(a) as being unpatentable over *Locke* in view of U.S. Patent Application Publication

2002/0065126 to Miller et al. Applicant respectfully submits that independent Claims 1, 16, 28, 39, 53 and 65 are in condition for allowance for the reasons discussed above. Accordingly, Claims 13 and 15, and Claims 27, 38, 52, 64 and 75 which depend therefrom, respectively, are also in condition for allowance.

Applicant respectfully requests that any subsequent Office Action indicate that the references cited in the Information Disclosure Statement filed on December 8, 2004, and the Supplemental Information Disclosure Statement filed herewith have been considered.

An earnest endeavor has been made to place this application in condition for allowance, and such allowance is courteously solicited. If the Examiner has any questions related to this Response, Applicant respectfully requests that the Examiner contact the undersigned.

Respectfully submitted,

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BY _____

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Amendments to the Drawings:

The attached sheet of drawings includes new Figures 3A and 4A.

Attachment: New Sheet of Drawings